

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

**IN RE: AQUEOUS FILM-FORMING
FOAMS PRODUCTS LIABILITY
LITIGATION**

MDL No. 2:18-mn-2873-RMG

This Document relates to:

City of Camden, et al., v. 3M Company,
No. 2:23-cv-03147-RMG

PLAINTIFFS’ AND 3M’S JOINT MOTION FOR ADDITIONAL PAGES

Plaintiffs, City of Camden, City of Brockton, City of Sioux Falls, California Water Service Company, City of Del Ray Beach, Coraopolis Water & Sewer Authority, Township of Verona, Dutchess County Water & Wastewater Authority and Dalton Farms Water System, City of South Shore, City of Freeport, Martinsburg Municipal Authority, Seaman Cottages, Village of Bridgeport, City of Benwood, Niagara County, City of Pineville, and City of Iuka (collectively, “Plaintiffs”) and Defendant 3M Company (“3M”), pursuant to Local Civil Rule 7.05(B), respectfully submits this Joint Motion for Additional Pages.

In support of their motion, Plaintiffs and 3M state as follows:

1. On July 26, 2023, twenty-three governmental entities identifying themselves as “Sovereigns” filed a Motion to Intervene in this case for purposes of objecting to Plaintiffs’ Motion for Preliminary Approval (Dkt. #35).¹

2. On the same day, (i) the Sovereigns filed an Omnibus Opposition to Plaintiffs’ Motion for Preliminary Approval (Dkt. #37), (ii) a “Subset of Sovereigns” filed a Supplemental Opposition to the Motion for Preliminary Approval (Dkt. #38), (iii) the States of Maine and Vermont (both signatories of the Omnibus Opposition) filed a Supplemental Memorandum of

¹ Plaintiffs and 3M each intend to respond to the Motion to Intervene within the 35-pages provided by Local Civil Rule 7.05(B)(1).

Law in Opposition to the Motion for Preliminary Approval (Dkt. #39), and (iv) The California State Water Resources Control Board and California Department of Corrections and Rehabilitation filed a “Joinder” in the Sovereigns’ Omnibus Opposition and the Subset of Sovereigns’ Supplemental Opposition to the Motion for Preliminary Approval (Dkt. #40) (collectively, the “Opposition Filings”).

3. The Opposition Filings contain 47 pages of argument, raising similar or related issues on behalf of the same or similar governmental entities.

4. Rather than submit separate memoranda (of up to 15 pages) in reply to each of the separate Opposition Filings, Plaintiffs and 3M request that each be permitted to file one reply memorandum addressing all of the Opposition Filings, not to exceed 35 pages in length. Thus, if the Court grants this motion, Plaintiffs would have up to 35 pages to address the Opposition Filings and 3M would also have its own 35 pages to address the Opposition Filings.

5. Pursuant to Local Civil Rule 7.02, counsel for Plaintiffs and 3M have conferred with counsel for the Sovereigns. The Sovereigns consent to the filing of this Motion and the relief requested herein.

6. Pursuant to Local Civil Rule 7.04, no accompanying memorandum has been submitted herewith because this Motion fully sets forth the grounds for relief, and a separate memorandum would serve no useful purpose.

For these reasons, Plaintiffs and 3M respectfully request that they each be permitted to file one memorandum in reply to the Opposition Filings not to exceed 35 pages in length.

Dated: July 31, 2023

Respectfully submitted,

/s/ Daniel L. Ring

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 31, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify the foregoing document is being served this day on all counsel of record in this case via transmission of Notice of Electronic Filing generated by CM/ECF.

/s/ Daniel L. Ring
Daniel L. Ring